



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
DENVER, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

Ref: 80C

February 22, 2011

Mike Noble, LATAG Chairman  
Libby Area Technical Assistant Group, Inc.  
PO Box 53  
Libby, MT 59923

Dear Mr. Noble:

Thank you for your letter dated October 10, 2010 on behalf of the Libby Area Technical Assistant Group regarding questions pertaining to EPA's Record of Decisions for operable unit one (OU1) also referred to as the former export plant and operable unit two (OU2) also referred to as the former screening plant. The questions mentioned in the letter were not included when the letter was submitted to EPA but were submitted via an email on December 7, 2010 by Tracy McNew, the LATAG Grant Administrator. Enclosed with this letter are EPA's responses to the questions.

Should the LATAG have any additional questions pertaining to OU1 or OU2, please contact Rebecca Thomas, Remedial Project Manager for OU's one and two at 1-800-227-8917, ext. 6552 or for more general questions regarding the Libby Superfund site, please contact me at 1-800-227-8917, ext. 6083.

Sincerely,

A handwritten signature in black ink that reads "Libby Faulk".

Libby Faulk  
Community Involvement Coordinator  
Libby Asbestos Superfund Site



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**EPA Response to LATAG Questions  
February 22, 2011**

**Question: Now that the Libby Amphibole-specific RfC values have been developed, we would like to know when they will become available for use.**

EPA Response: EPA is hopeful that the toxicity values for Libby Amphibole will be released in 2011.

**Question: Will visible vermiculite be covered or removed as part of the remedy and will visible vermiculite be covered or removed as it is discovered on OU1?**

EPA Response: Yes, visible vermiculite will be covered or removed as part of the remedy for OU1. The Environmental Resource Specialist (ERS) program, or something similar, will be available to address any vermiculite that may be encountered in the future.

**Question: Will all potential pathways of exposure be assessed as part of the ABS at OU1 after construction is complete and toxicity values are available to confirm effectiveness of the remedy?**

EPA Response: The post construction risk assessment for OU1 will include ABS for activities that are likely to occur at the park and have the greatest potential to disturb soil. EPA will also conduct clearance sampling in the search and rescue facility. The post construction risk assessment will include any new information such as a revised toxicity values.

**Question: Since it is probable that exposures to LA will occur outside of OU1, is EPA considering these additional exposures in its remedy for OU1?**

EPA Response: No, EPA did not consider exposures outside of OU1 when selecting the remedy. EPA is currently preparing a site-wide risk assessment which will consider exposures across operable units.

**Question: Will EPA establish an ambient air quality station specific to OU1? Will ambient air quality be assessed during construction of the remedy? Is risk associated with short fibers (< 5µm) being addressed in the current ambient air monitoring?**

EPA Response:

Regarding ambient air quality at OU1:

An ambient air quality monitoring program has been established for Libby. Monitoring was conducted over a 7 month period in 2010. There were a total of 6 monitors. The closest monitors to OU1 are located on the City Service Road near Riverside Park. EPA intends to continue this monitoring in 2011. For your information, EPA has included a copy of the summary ambient air sampling report that has been implemented in the past.

This report is also available at EPA's website: <http://epa.gov/region8/superfund/libby> under the Site Documents webpage within the Ambient Air Sampling Programs section. The ambient air monitoring program may be revised over time.

Regarding ambient air quality during construction at OU1:

Air monitoring of both the remediation workers and the construction site will be performed.

Regarding short fibers:

Short fibers [ $<5\mu$ ] are not being addressed in current risk assessments; only Phase Contrast Equivalent fibers are being used to estimate exposure.

**Question: Will long term ambient air monitoring be included as part of the ICs to sampling to verify the effectiveness of remedy and ensure protection of public health? In addition, is EPA considering utilizing personal air monitors in OU1 on maintenance workers?**

Institutional controls, or land use controls, are administrative and are often placed on properties to limit activities that could compromise the integrity of the remedy. Monitoring is not considered an institutional control. An operation and maintenance (O&M) plan will be developed to maintain the integrity of the engineered components of the remedy. Monitoring will be considered as part of the O&M plan. Routine reviews will be conducted to ensure long-term protectiveness of the remedy. EPA is not considering personal air monitors in OU1 on maintenance workers.